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January 30, 2020

Hon. Alison J. Nathan United States District Judge Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

Re: Red Tree Investments, LLC v. Petróleos de Venezuela, S.A. et al., No. 1:19-cv-02523

(related to No. 1:19-cv-02519)

Dear Judge Nathan:

We write on behalf of the parties in the above-captioned action with regards to the briefing schedule for Defendants' motion for Rule 56(d) discovery. With Defendants' consent and in light of the holiday on February 17, 2020, we respectfully request that the Court amend the briefing schedule to the following dates:

Defendants' Rule 56(d) motion: February 7, 2020
Plaintiff's opposition: February 18, 2020
Defendants' reply: February 25, 2020

Sincerely,

/s/ Daniel Salinas-Serrano
Daniel Salinas-Serrano